

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)  
Re: Business Opportunity Rule, R511993  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

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Dear Sir or Madam:

I am writing this letter because I am concerned about the FTC's proposed Business Opportunity Rule (R511993). I do realize that it is very important to protect the consumer from those companies that are using deceptive practices to gain a new customers or new Independent Distributors. I wanted to share some thoughts that I have that pertain to this subject.

I have enjoyed being a small business owner for most of my life. I was introduced to USANA 7 years ago, and fell in love with a company who's integrity I admired and quality of products that have made a difference in my life. I have built a very wonderful organization - which by many standards is considered large. I have built this, like all of my other businesses, with blood, sweat and tears. I have work very hard making sure that everyone had access to the free training that I provide and as much mentorship as they needed to succeed (all at no charge). This is NOT an easy business. Nor do I paint that picture to my associates..... (you are invited to a training call to hear this first hand, if you like). As I write this, I am feeling overwhelmed at the thought of adding to my already heavy workload... It is sure to have an effect my ability to help others.  
PLEASE DON'T PUNISH THOSE OF US WHO REALLY OPERATE IN INTEGRITY!

I am wondering about how the seven day wait period could be better than the 30 day money back guarantee that USANA already offers to people that sign on as independent distributors of USANA?? I believe if the FTC were to establish a minimum requirement guidelines for a Company Return Policy to be 7 days – you would accomplish the same goal, with less mess. People could sign on and still be able to change their mind... which I am assuming is the main objective??

For me all of the paperwork and confusion wouldn't serve the consumer any better than USANA's already wonderfully generous policies.

As far as the proposed rule, it also calls for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Why? My father was sued for someone cutting off their hand in a machine that he had sold to his employer. My father did EVERYTHING he was supposed to do, yet had to pay several hundred thousand dollars and a lot of time to clear his name. Let the guilty be revealed, there are just too many "sue-happy" people in this country to take a lawsuit as seriously as a conviction.

Finally, the proposed rule requires the company to disclose to each prospective independent USANA Associate the names and contact information of a minimum of 10 previously enrolled independent USANA Associates who live nearest to the prospective Associate. Wow.....I certainly don't want **MY** name given out to everyone.....imagine the

chaos. I already have enough work to do, let alone the security issue (which I will address in a minute).... Imagine – of every 10 people that you talk to 3 are interested and 1 signs up. Does everyone get a names list? And then what ? They get to call me to find out how I am doing in USANA? (what does that have to do with how well they will do with USANA?) I think I would have to call it a “Calgon” day if I add those calls to the ones I already get. (In case you are old enough to remember what that means). Now to the security concern.....this means that other companies have access to my associate’s names..... they could potentially call them to discuss their company. I would not be a happy camper, as you can imagine. What companies in other industries have to give out the names of their customers to other customers, except by choice or “reference”??

I am assuming the objective is to have the prospective associate be able to get references... but what will they be getting references on? How the company operates or the level of Success those individuals have had?? If you have a good company.... the success of the person has everything to do with their desires, their effort and their competency. This is NO DIFFERENT than University studies.... You wouldn’t base your decision whether to take up dentistry by asking random Dentists whether or not they have been successful in their trade? There is much more information that you need to take into account..... so the practice of giving people 10 names in their area wouldn’t serve the assumed objective of this policy.

If you really want to control that... put up a list of criteria that people should look for when reviewing a network marketing opportunity, so they don’t get blown over. Perhaps things like, “ask for references”, “do they have a money-back guarantee?”, etc. As time goes on, I see more people really understanding what questions to ask as they embark in an entrepreneurial endeavor, so... soon, I think this might be a moot point.

I am the breadwinner of our family and USANA is my only income..... I hope that you can come up with some creative ideas to provide protection to the consumer without it coming at the expense of those companies and associates who are living up to ethical and high integrity standards of doing business! I am confident that you can.

Thank you for your time in considering my comments.

In Happiness & Health,

Annette Walbon